

## IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

Johnas Ortiz,

Petitioner,

v.

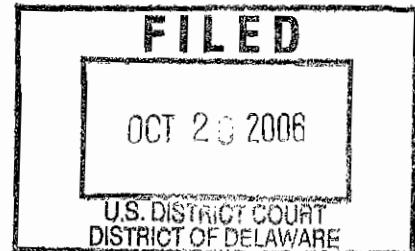
Raphael Williams, Warden,

Carol Danberg, Attorney

General of the State of Delaware,

Respondents.

Cv. Act. No. 06-260-SLR



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REQUEST FOR PRODUCTION

PETITIONER, Johnas Ortiz, requests, pursuant to Federal Rules of Civil Procedure, that respondents produce for inspection and copying the following documents:

1. THE "DOC" FILE CONTAINING COMPLETE PRISON RECORDS OF PETITIONER REGARDING SUPERIOR COURT CASE NO. 0308001824; AND, OR,
2. ALL ORIGINALS OR COPIES, IDENTIFIABLE AS REPORTS OF TRANSFERS TO LEVEL 4 FACILITIES (WORK-RELEASE, ETC.) MADE BY PRISON AND CIVILIAN AUTHORITIES OF THE DELAWARE DEPT. OF CORRECTIONS;
3. ALL INTRADEPARTMENTAL MEMORANDA REGARDING PETITIONER'S TRANSFER AND RELEASE DATES OF/FROM ALL "DOC" FACILITIES WHILE SERVING LEVEL 4 AND LEVEL 5 TIME DURING HIS SERVICE OF ANY LEVEL 4 OR LEVEL 5 SENTENCE IMPOSED FOR VOP (INCLUDING HIS ORIGINAL OCTOBER 1, 2003 SENTENCE) UNLESS HIS DESIGNATED SUPERIOR COURT CASE NO. 0308001824;
4. ALL ORIGINALS OR COPIES, WHICH IDENTIFY EXACT DATES PETITIONER WAS INCARCERATED, AND IN WHICH FACILITY;
5. ALL RULES, REGULATIONS, AND POLICY REGARDING "INMATE SENTENCE COMPUTATION" PROCEDURES USED BY DELAWARE DEPARTMENT OF CORRECTIONS, IN COMPUTING CREDIT FOR ACTUAL DAYS SERVED IN A LEVEL 5 FACILITY.

THIS MOTION IS BASED UPON THE PAPERS AND FILES IN THIS MATTER (WHICH ARE RELEVANT TO THE SUBJECT MATTER REGARDING THE EXACT AMOUNT OF TIME PETITIONER HAS SERVED AT LEVEL 5) INVOLVED IN THE PENDING ACTION.

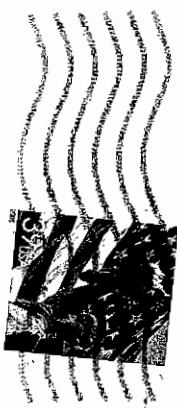
DATE: 10/17/06

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Wilmington, DE 19809

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